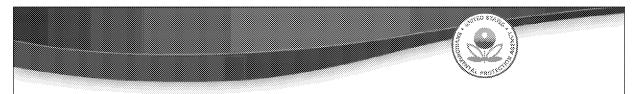
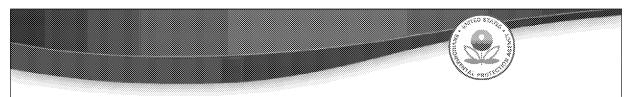
## U.S. Environmental Protection Agency Mid America Steel Drum Company Investigation

January 27, 2018



#### **EPA Role in Investigation**

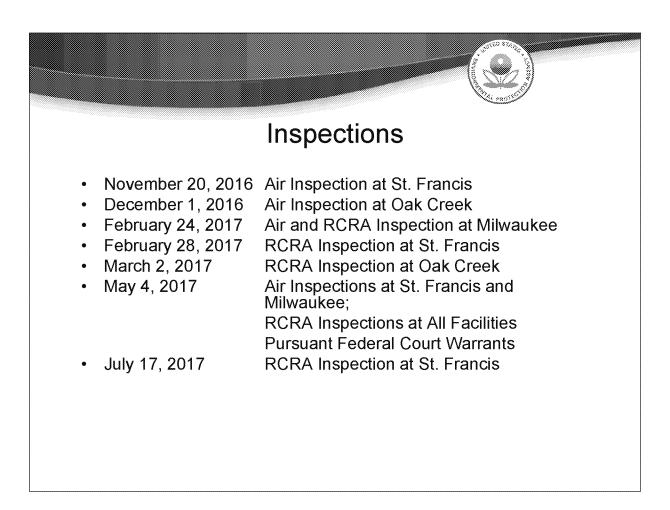
- Enforce Environmental Laws Federal and State Regulations
  - Clean Air Act and Hazardous Waste Laws (RCRA)
  - Overseeing State Enforcement of Water Regulations
  - Working Cooperatively with WDNR on Air and RCRA Violations
- · Potential Impacts on Human Health and the Environment



# Mid America Steel Drum Company Facilities

- Three Facilities Oak Creek, St. Francis, Milwaukee
  - Drum reconditioning
  - Oak Creek processes 55 gallon metal drums through a furnace
  - St. Francis processes 55 gallon metal and plastic drums with a hot water/chemical wash operation
  - Milwaukee processes 275 gallon plastic totes in a residue removal and hot water/chemical wash operation
  - Metal Drums are painted and dried in an oven at Oak Creek and St. Francis

Process description – Drums come from companies used, then cleaned through the furnace or hot water washes. Old paint is removed from the metal drums and then they are repainted and dried in an oven, All the drums and totes are sold back to companies.



May 4, 2017 – haz waste samples taken from drums/totes, waste streams and ash from the furnace.



## **Environmental Sampling**

May 4, 2017
 5 Air Canister Samples Taken Around

St. Francis Facility

July 17, 2017
 9 Air Canister Samples Taken Around

St. Francis Facility

7 Soil Samples Taken Around St. Francis

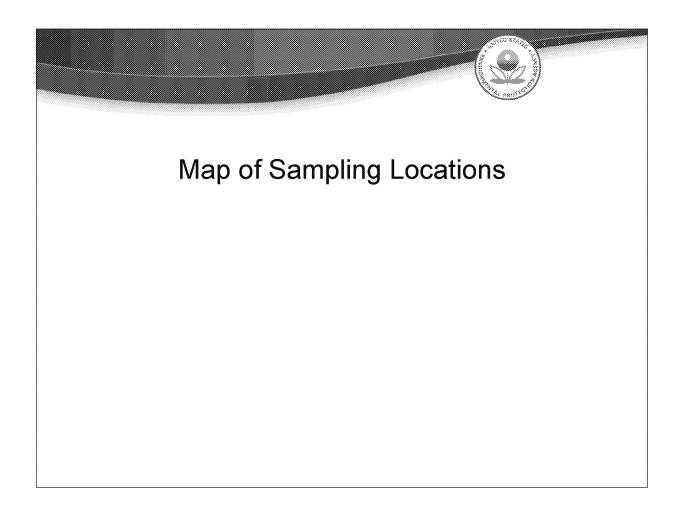
Facility

August 30, 2017
 9 Air Canister Samples Taken Around

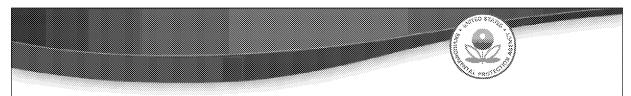
St. Francis Facility

May sampling – grab samples

July and August – composite sampling – over 6-8 hours

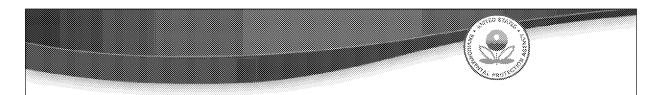


ATSDR will be discussing the sampling results in a few minutes



#### Violations Alleged by EPA

- RCRA
  - Transportation, Storage, and Treatment of Hazardous Waste
  - Failure to Make Hazardous Waste Determinations
  - Failure to Notify Agencies of Hazardous Waste Activities
- · Clean Air Act
  - Failure to Conduct Appropriate Testing
  - Failure to Provide Emissions Information in Permit Application and Obtain Appropriate Permits
  - Emission of Excess Volatile Organic Compounds and Hazardous Air Pollutants
  - Failure to Properly Operate Pollution Control Equipment
  - Failure to Comply with Clean Air Act Hazardous Waste Requirements



#### **Next Steps**

- · Company Has Denied Allegations
- In Negotiation Discussions with Company
- If Cannot Reach a Negotiated Settlement, May Pursue Formal Enforcement
- EPA Policy Prohibits Disclosing Status of Settlement Negotiations and enforcement Plans
- Complaints Regarding the St. Francis Facility Can Be Directed to the St. Francis Health Department.